



**In Re: AUTOMOTIVE WIRE HARNESS  
SYSTEMS ANTITRUST LITIGATION**

This Document Relates to:

**All Automobile Dealer Actions**

*Hammett Motor Co., Inc. v. Delphi Automotive  
LLP, et al.*, No. 12-10688;

*Landers Auto Group No. 1, Inc. d/b/a Landers  
Toyota v. Delphi Automotive LLP, et al.*,  
No. 12-10676;

*Superstore Automotive, Inc. v. Delphi Automotive  
LLP, et al.*, No. 12-10687;

*Martens Cars of Washington, Inc. v. Furukawa  
Electric Co., et al.*, 12-10681

MDL No. 2311

Judge Marianne O. Battani  
Magistrate Mona K. Majzoub

**Declaration of Shawn M. Raiter**

You declarant, Shawn M. Raiter, declares and states as follows:

1. I submit this declaration in support of Plaintiffs' Motion to Consolidate Automobile Dealer Indirect Purchaser Cases, For Leave to File Consolidated Class Complaint, and to Appoint Interim Class Counsel for the Automobile Dealer Indirect Purchasers.

2. I am a partner in Larson • King, LLP, a law firm located in Saint Paul, Minnesota. Our firm currently has 35 attorneys and devotes the majority of its practice to the representation of clients involved in mass torts, products liability, complex and class action litigation.

3. I am a 1993 *magna cum laude* graduate of the William Mitchell College of Law in St. Paul, Minnesota. I have practiced exclusively in the area of civil litigation since being

admitted to the state bars of Minnesota, Wisconsin, Iowa and North Dakota. I have tried cases to verdict in state, federal and administrative courts and have lectured at continuing legal education seminars both locally and nationally. I have argued more than a dozen times in various appellate courts.

4. I have been selected for inclusion in *The Best Lawyers in America* for plaintiffs' mass tort and class action litigation in 2010, 2011 and 2012 and have been named a "Super Lawyer" for class action / mass tort litigation from 2004 to 2011 by *Minnesota Law & Politics* magazine following a peer selection process.

5. I have been selected or appointed to serve as lead or co-lead counsel and other leadership positions in a number of multidistrict litigations including:

- *In re Zurn Pex Plumbing Prod. Liabl. Litig.*, MDL No. 1958 (D. Minn.) (Lead Counsel)
- *In re Uponor, Inc. F1807 Plumbing Prods. Liab. Litig.* MDL No. 2247 (D. Minn.) (Lead Counsel)
- *In re Building Materials Corp. of Am. Asphalt Roofing Shingle Prods. Liab. Litig.*, MDL No. 2283 (D. S.C.) (unopposed appointment as Co-Lead Counsel pending)
- *In re Kitec Plumbing Sys. Prods. Liab. Litig.*, MDL No. 2098 (N.D. Tex.) (Plaintiffs' Executive Committee)
- *In Re: Baycol Prods. Liab. Litig.*, MDL No. 1431 (D. Minn.) (lead firm attorney as Plaintiffs' Liaison Counsel)

I am currently involved in several other MDL litigations, including *In re Imprelis Herbicide Marketing, Sales Practices and Prod. Liab. Litig.*, MDL 2284 (E.D. Pa.) and products liability cases related to defective "Chinese Drywall," which has been established as an MDL proceeding in the Eastern District of Louisiana as *In re: Chinese-Manufactured Drywall Prod. Liab. Litig.*, MDL 2047 (E.D. La.).

6. I have served as lead or co-lead counsel on behalf of the plaintiffs in numerous class actions, including the non-exhaustive list of cases:

- *Johnson et al. v. Gentek Building Products, Inc.*, No. Civ. 12-cv-376 (D. Minn.)
- *George et al. v. Uponor, Inc.* No. Civ. 12-cv-00249 (D. Minn.)
- *Washington et al. v. National Football League*, No. Civ. 11-cv-3354 (D. Minn.)
- *Livermont et al. v. Uponor, Inc.*, No. Civ. 11-cv-845 (D. Minn.)
- *Haner v. Building Materials Corp. of Am.*, No. Civ. 11-cv-1443 (D. Minn.)
- *Dryer et al. v. National Football League*, No. Civ. 09-cv-2182 (D. Minn.)
- *Kennedy v. E. I. Du Pont Nemours and Co., et al.*, No. Civ. 11-cv-2251 (D. Minn.)
- *Cox et al. v. Zurn Pex, Inc.*, 267 F.R.D. 549 (D. Minn. 2010)
- *Fielstra v. Uponor, Inc.*, Civ. 11-575 (C.D. Cal.)
- *McGregor, et al. v. Uponor, Inc.*, No. Civ. 09-cv-01136 (D. Minn.)
- *Frank, et al. v. Gold'n Plump*, No. Civ. 04-cv-1018 (D. Minn.)
- *Carpenters and Joiners Welfare Fund, et al. v. GlaxoSmithKline*, No. Civ. 04-cv-3500 (D. Minn.)
- *Robinson, et al. v. Novellus Systems, Inc.*, No. Civ. C03-03603 (N.D. Cal.)
- *Russo, et al. v. College Board*, No. Civ. 06-cv-1481 (D. Minn.)
- *Kramer, et al. v. NCS Pearson, Inc.*, No. Civ. 03-cv-1166 (D. Minn.)
- *Daud, et al. v. Gold'n Plump*, No. Civ. 06-cv-4013 (D. Minn.)
- *Russell, et al. v. Wells Fargo*, No. Civ. C-07-0993 (N.D. Cal.)
- *Mahoney, et al. v. Fidelity Nat. Title Co.*, No. Civ. SACV 08-0561 (C.D. Cal.)
- *Grabman, et al. v. BrakeBush Brothers, Inc.*, No. Civ. 07-cv-1031 (E.D. Wis.)
- *Phelps, et al. v. Green Bay Dressed Beef*, No. Civ. 08-cv-0037 (E.D. Wis.)
- *Helmert, et al. v. Butterball, LLC*, No. Civ. 4:08-cv-0342 (E.D. Ark.)

- *DeKeyser, et al. v. ThyssenKrupp Waupaca, Inc.*, No. Civ. 08-cv-00488 (E.D. Wis.)
- *Sushoreba, et al. v. Easy Heat*, No. Civ. C5-02-300117 (St. Louis Co., MN)
- *Schermer, et al. v. State Farm*, No. Civ. 02-20839 (Henn. Co., MN)
- *VanderLaan, et al. v. Lutheran Brotherhood*, No. Civ. 03-9722 (Henn. Co., MN)
- *Kurvers, et al. v. Nat'l Computer Systems, Inc.*, No. Civ. 00-11010 (Henn. Co., MN)

7. Attorneys at my firm have been involved in many of the high-profile natural, environment and product disputes litigated over the past 30 years including some of the first mass tort claims litigated in the United States going back as far as the Dalkon Shield litigation, the Times Beach Dioxin Disaster in Missouri, the MGM Grand fire in Las Vegas, the Teton Dam collapse in Idaho, the Union Carbide Disaster in Bhopal, India, breast implants and asbestos. *See, e.g., Gardiner v. A.H. Robins Co., Inc.*, 747 F.2d 1180 (Ct. App. 1984) (Dalkon Shield); *In Re: MGM Grand Hotel Fire Litig.*, MDL No. 453; *In Re: San Juan duPont Hotel*, MDL No. 723; *In Re: Silicone Gel Breast Implant Products*, MDL No. 926; *In Re: Asbestos Products Liab. Litig., No. VI*, MDL No. 875.

8. Since our firm was founded just over 10 years ago, we have recovered more than \$1.6 billion for our clients. This amount reflects money actually paid to the clients, not settlement funds merely made available to claimants. The firm has also tried class action lawsuits to verdict, *see, e.g., Schurmeier v. Nash Finch*, No. Civ. 06-cv-3860 (D. Minn.), and tries numerous non-class action cases to jury verdict each year.

9. In addition to the representation of plaintiffs, our firm also represents businesses including Fortune 100 and Fortune 500 companies. We are often hired to provide advice and representation in mass torts, class actions and complex civil matters.

Members of our firm specialize in white collar litigation involving governmental investigations and charges like those presented in this MDL.

10. A substantial part of our practice is devoted to leading and coordinating litigation in different venues. In addition to our involvement in MDL and class action litigation on behalf of Plaintiffs, our firm also coordinates litigation and tries cases across the country for several major corporations involved multi-district and other complex litigation.

11. With 35 attorneys, our firm has the resources necessary to serve as one of the lead firms representing the automobile dealers in this litigation. We have the ability to dedicate significant staffing to this litigation and will invest the out-of-pocket litigation expenses necessary to properly litigate the claims of the putative class members.

I affirm under penalty of perjury that the foregoing is true to the best of my knowledge.

/s/ Shawn M. Raiter  
Shawn M. Raiter (MN Bar #240424)

Lk1327865